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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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In the Matter of

Amendment of Part 74 of the Commission's Rules and Regulations with Regard to the Low Power Television Service

) RM-7772

Federal Communications Communications
Office of the Secretary

To: The Commission

COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING

Radio New Jersey ("RNJ"), by its counsel, hereby submits its comments in support of the above-captioned rule making petition and requests that the Commission issue promptly a Notice of Proposed Rulemaking consistent with the proposals contained in that petition. In support hereof, RNJ respectfully states as follows:

1. RNJ supports the petition for rulemaking filed by the Community Broadcasters Association (CBA") on June 11, 1991. See Public Notice, Report No. 1855, released August 13, 1991 (establishing 30-day comment period). RNJ believes that the petition supplies a well-considered regulatory regime for continued improvement of the quantity and quality of service provided to the public by LPTV operators.

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- 2. RNJ is the permittee of Station W33AQ, Palmerton, Pennsylvania. It expects shortly to receive a construction permit for an LPTV station in northern New Jersey. Through its planning for station construction and operation RNJ has discerned some of the competitive disadvantages under which LPTV stations operate in the video marketplace. These disadvantages can be lessened through CBA's proposed solutions, including the introduction of normal four and six-letter television call signs, increased power for qualifying "community" stations, and the treatment of qualifying stations as "television" stations for general regulatory purposes.
- 3. By fine tuning its regulatory regime for LPTV stations, the Commission would assist the industry in its efforts to achieve the goals established by the Commission when it created the LPTV service.

Accordingly, RNJ requests that the Commission issue a Notice of Proposed Rule Making consistent with CBA's petition and secure public comments on the rule changes proposed therein.

Respectfully submitted,

RADIO NEW JERSEY

By:

Hawrence Roberts

Mullin, Rhyne, Emmons and Topel, P.C. 1000 Connecticut Avenue--Suite 500 Washington, D.C. 20036 (202) 659-4700

Its Counsel

September 10, 1991

CERTIFICATE OF SERVICE

I, Veronica Abarre, a secretary in the law firm of Mullin, Rhyne, Emmons and Topel, P.C., do hereby certify that on this 10th day of September, 1991, a copy of the foregoing "Comments In Support Of Petition For Rulemaking" was sent by first class mail, postage prepaid, to the following:

Peter Tannenwald, Esq.
Arent, Fox, Kintner,
Plotkin & Kahn
1050 Connecticut Avenue, N.W.
Suite 600
Washington, D.C. 20036-5339
Counsel to the Community Broadcasters Association

Jennia Abarre